



**INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE**

September 28, 2010

Marlene Dortch  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re:    *Developing a Unified Inter-carrier Compensation Regime***  
**CC Docket 01-92**

***Establishing Just and Reasonable Rates for Local Exchange Carriers***  
**WC Docket No. 07-135**

***Feature Group IP Petition for Forbearance Pursuant to 47 U.S.C. § 160(c)***  
***from Enforcement of 47 U.S.C. § 251(g), Rule 51.701(b)(1), and Rule 69.5(b)***  
**WC Docket No. 07-256**

***Framework for Broadband Internet Service***  
**GN Docket No. 10-127**

Dear Ms. Dortch:

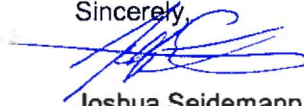
On September 27, 2010, the undersigned met with Christine D. Kurth of Commissioner Robert M. McDowell's office to discuss the above-captioned proceedings.

ITTA urged the Commission to implement measures that address phantom traffic, access stimulation, and obligations of VoIP providers to pay access for calls terminated on the public switched telephone network (PSTN). Immediate action on these items will reduce incentives for arbitrage, strengthen provider stability by enabling proper cost recovery, and serve as a reasoned prelude to further comprehensive reform.

ITTA also discussed the strongly competitive broadband market, and noted that, where appropriate, the Commission's ancillary jurisdiction is sufficient. Therefore, ITTA urged the Commission to refrain from introducing regulations aimed at broadband Internet access services.

Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,



Joshua Seidemann  
Vice President, Regulatory Affairs

cc: Christine D. Kurth